

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 03-10383-RGS
	)	
JULIO FRANCO	)	
	)	

ASSENTED-TO MOTION TO CONTINUE HEARING DATE

The defendant in this matter respectfully requests a continuance of the motion hearing date set for May 2, 2007. As reason therefore, defense counsel states that he needs additional time to supplement the filings in this case as to Defendant's Motion to Suppress Evidence (docket entry document 74) .

Defense counsel has discussed this request for a continuance of the hearing date with Assistant United States Attorney William Connolly. He has expressed that he would not object to the granting of this continuance. Defense counsel respectfully proposes that the evidentiary motion hearing date be continued to a convenient date in early June 2007 (week of June 4 or June 11) and that would give sufficient time for any supplementary memoranda and or affidavits to be filed. Defense counsel will file all supplementary materials ten days prior to the any newly scheduled hearing date and that should give the government ample time to respond in writing if it chooses to do so.

JULIO FRANCO

By his attorney,

/s/Oscar Cruz, Jr.

Oscar Cruz, Jr.

B.B.O. #630813

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CERTIFICATE OF SERVICE

\_\_\_\_\_, I, Oscar Cruz, Jr., hereby certify that this document filed through the ECF system will be sent electronically to the registered participant, William Connolly, as identified on the Notice of Electronic Filing (NEF) on April 30, 2007.

/s/Oscar Cruz, Jr.

Oscar Cruz, Jr.